

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT

SONRAI SYSTEMS, LLC,

Plaintiff,

v.

ANTHONY M. ROMANO, GEOTAB, INC.,
and HEIL CO. D/B/A ENVIRONMENTAL
SOLUTIONS GROUP

Defendants.

Civil Action No. 1:16-cv-03371

District Judge Thomas M. Durkin

UNOPPOSED MOTION TO FILE DOCUMENTS UNDER SEAL

Defendant Geotab Inc. (“Geotab”), by and through its counsel, requests leave under Local Rule 26.2 to file its summary judgment brief, statement of facts, and exhibits under seal. In support of this Motion, Geotab states as follows:

1. During the off-the-record summary judgment conference held on June 22, 2023, Geotab raised the need to file under seal certain summary judgment papers marked as confidential or containing information that a party had designated as confidential under the Protective Order, with a redacted version to be filed thereafter.

2. Geotab understood the Court approved of this approach during the conference, but no formal motion was made and no order was issued to that effect.

3. As part of its motion for summary judgment, Geotab will be filing a number of exhibits that other parties have marked as confidential under the Protective Order. Geotab’s brief in support of that motion and its statement of material facts cite to, and at times quote, those exhibits.

4. Geotab conferred with Co-Defendants Anthony Romano and The Heil Co. and with Plaintiff Sonrai Systems, LLC, all of whom have indicated they have no objection to Geotab's motion for leave to file its papers under seal.

WHEREFORE, Geotab respectfully requests leave to file its summary judgment brief, statement of material facts, and its associated exhibits under seal with redacted versions to be filed by September 1, 2023.

Dated: August 18, 2023

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Respectfully submitted,

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Counsel for Defendant Geotab, Inc.

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Jason W. Balich
Jason W. Balich